



1300 I Street, NW, Suite 400 West  
Washington, DC 20005

Phone 202-515-2530  
Fax 202-289-7983  
[Jacquelynn.l.ruff@verizon.com](mailto:Jacquelynn.l.ruff@verizon.com)

October 17, 2012

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Reporting Requirements for U.S. Providers of International  
Telecommunications Services, IB Docket No. 04-112**

Dear Ms. Dortch:

On October 16, after the Commission removed this item from the list of Agenda items scheduled for consideration at the October 17, 2012, Open Meeting, I spoke with Jim Ball, Chief of the International Bureau Policy Division about this docket. In our conversation, I reiterated the concerns we had raised in our October 11 ex parte,<sup>1</sup> including our concern over proposals to make public detailed and competitively sensitive traffic and revenue data filed by carriers pursuant to international reporting requirements. I also expressed our concerns over proposals to sunset any confidentiality or to require the Bureau to rule on confidentiality requests or petitions to withhold from public disclosure pursuant to FOIA at the time of filing.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

/s/ Jacquelynn Ruff

Jacquelynn Ruff

---

<sup>1</sup> Letter from L. Hochstein to M. Dortch, *Reporting Requirements for U.S. Providers of International Telecommunications Services*, IB Docket No. 04-112 (filed Oct. 11, 2012).